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8 Attorneys for Defendant Monique Burns

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12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14
15 UNITED STATES OF AMERICA,

16 No. CR 3-12-mj-70126 MEJ

17 Plaintiff,

18 v.
19 MONIQUE BURNS,
20 Defendant.

21 _____ /

22

23 UNOPPOSED MOTION TO MODIFY
24 RELEASE CONDITIONS;
25 ORDER MODIFYING CONDITIONS OF
26 RELEASE

27 By and through counsel, defendant Monique Burns respectfully requests that her release
28 conditions in this case be modified, as follows:

1. The defendant is permitted to travel to Tucson, Arizona for a period of four days
2. – October 19, 2012 through and including October 22, 2012.

3. **All other conditions will remain in effect.**

4. The reason for this request for a modification of travel restrictions is that Ms. Burns
5 would like to attend “family weekend,” which is held at her son’s college. Ms. Burns’ son is
6 currently enrolled as a freshman at the University of Arizona in Tucson.

1 Ms. Burns has rented a car for this trip – the make, model and license plate of the vehicle
2 she will be using has been provided to Pretrial Services. While in Tucson, she will be staying at
3 the Four Point Sheraton, located at 7060 South Tucson Blvd, Tucson, AZ 85756, phone number
4 (520) 746-0271.
5

6 Pretrial Services Officer Betty Kim has been contacted, and she has no opposition to this
7 modification. In addition, United States Attorney Kevin Barry has been contacted, and he has no
8 objection to the request, given the approval of Pretrial Services.
9

10 The undersigned, Camellia Baray, declares under penalty of perjury that the foregoing is
11 true and correct to the best of her information and belief.
12

13 Dated: October 3, 2012

Respectfully submitted,

14 BONJOUR, THORMAN,
15 BARAY & BILLINGSLEY,
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17 /S/
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19 CAMELLIA BARAY
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13 IN THE UNITED STATES DISTRICT COURT
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15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

17 No. CR 3-12-mj-70126 MEJ

18 Plaintiff,

19 v.

20 ~~PROPOSED~~ ORDER MODIFYING
21 CONDITIONS OF RELEASE

22 MONIQUE BURNS,

23 Defendant.

24 Based on the approval of the parties and good cause appearing therefore, it is
25 ORDERED that the defendant's release conditions be modified as follows:

26 1. The defendant be permitted to travel to Tucson, Arizona from October 19, 2012
27 through and including October 22, 2012.

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Unopposed Motion to Modify Release Conditions
And Proposed Order
No. CR 3-12-mj-70126 MEJ

2. All other conditions will remain in effect.

Dated: October 3, 2012

Honorable Maria-Elena Jaramillo

The Honorable Maria-Elena James
United States Magistrate Judge

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